IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	Robert Sorrentino
	Senior Vice President, Taxes, Random House, Inc.
Date: 1/2/07	Date:
James Frey Big Jim Industries, Inc.	Robert Sorrentino
	President, Doubleday & Company, Inc.
Date: 1/2/07	Date:
- M. R. frum	
Maya Frey	Robert Sorrentino
	Vice President, Taxes, Random House VG, Inc.
Date: 1/2/07	
	Date:
- Pull herry	
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants

Date:____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	Robert Sorregano Senior Vice President, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
Derek J. Meyer McDermott Will & Emery LLP 227 West Monroe Street, Suite 4400 Chicago, Illinois 60606 Attorney for the Frey Defendants	Mark B. Blocker Sidley Austin LLP One South Dearborn Chicago, Illinois 60603 Attorney for the Random House Defendants
Date:	Date: 12/28/2006

FOR THE PLAINTIFFS	FOR	THE	PLA	INT	IFFS
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Plaintiff Marcho Vedral	Michele Snow
Larry D. Drury Lad. 205 W. Randolph Street. Suite 1430 Chicago. Illinois 60606 Proposed Co-Leud Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plana, Swite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Load Class Comsel Atturney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Colui Oute:	Plaintiff Ann Marie Strack Date:
Thomas Mulisney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Listing Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chrongo, Illinois, 60603 Attorney or Plaintiff Ann Marie Street
Date:	Date:

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FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
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Larry D. Drury	Evan J. Smith, Esquire
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Attorney for Plaintiff Marcia Vedral	Proposed Co-Lead Class Counsel
	Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Diane Marolda	Plaintiff Ann Marie Strack
Date: 12/1/06	Date:
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500	Zimmerman and Associates, P.C.
New York, New York 10017	100 West Monroe Street, Suite 1300
Phone: (212) 223-0800	Chicago, Illinois 60603
Liaison Class Counsel Attorneys for Plaintiff Diane Marolda	Attorney or Plaintiff Ann Marie Strack
Date: 10 5 7/W	
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FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury	Even I Swith Francis
Larry D. Drury Ltd.	Evan J. Smith, Esquire Brodsky & Smith, LLC
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Date:	Date:
Plaintiff Jennifer Cohn	Plaintiff Ann Marie Strack
Date:	Date: 12-8-06
Date	Date. 128-06
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Thomas Mullaney	Thomas A. Zimmerman, Jr.
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Liaison Class Counsel	Attorney or Plaintiff Ann Marie Strack
Attorneys for Plaintiff Jennifer Cohn	
Date:	Date: 12-11-2006

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Plaint I Jimpy Hoyd	Plaintiff Jill Giles
Dest 1/4/07 - 1	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center
New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street Cincinnati. Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: December 5, 2006	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Scattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich	

Date:_

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
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Date:	Date:
Alan S. Ripka	A1 12
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Attorney for Plaintiff Jimmy Floyd	
2	Cincinnati, Ohio 45202
11-6	Attorneys for Plaintiff Jill Giles
Date: 11/29/06	Date:
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Plaintiff Pilar More	Plaintiff Chara P. 1
	Plaintiff Shera Paglinawan
Date: 11 29/06	Date:
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Thomas E. Pakenas	Michael David Myers
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Attorneys for Plaintiff Pilar More	Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
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Vincent L. DiTommaso	
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7W 220 22nd Street, Suite 200	
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Plaintiff Jimmy Floyd	Plaintiff Jill Giles	
Date:	Date:	
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115 Broadway	2900 Chemed Center	
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Attorney for Plaintiff Jimmy Flayd	Cincinnati, Ohio 45202	
	Attorneys for Plaintiff Jill Giles	
Date:	Date:	
Plaintiff Pilar More	Plaintiff Shera Paglinawan	
Date:	Date:	
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw Date:	
Date:	Michael David Myers	
S. P. C.	Myers & Company, P.L.L.C.	
	1809 Seventh Avenue, Suite 700	
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	Attorney for Plaintiff Shera Paglinawan	
C P,	Date:	
Plaint F Sara Brackenrich		
Date: 20 Nov. 06		
Date: 6/0 Nov. OL		
Difformaso & Lubin, PC	ment :	

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Plaintiff Jimmy Floyd	Maintiff Jill Giles
Date:	Date: 12-7-0 6
	Date: 12-17-0
Alan S. Ripka	Alan Disaman
Napoli Bein Ripka LLP	Colleen M. Hegge (of counsel)
115 Broadway	2900 Chemed Center
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	Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
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Attorneys for Plaintiff Pilat More	Attorney for Plaintiff Shera Paglinawan
Date:	Date:
Plaintiff Sara Brackenrich	
Date:	
Vincent L. DiTommaso	•
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Oakbrook Terrance, Illinois 61081	
Attorney for Plaintiff Sara Brackenrich	
Date:	

Plaintiff v	
Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Transfer our Giles
	Date:
Alan S. Ripka	
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Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street
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Dete	Attorneys for Plaintiff Jill Giles
Date:	Date:
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Plaintiff Pilar More	Xhuo Do
	Plaintiff Shera Paginawan
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Thomas E. Pakenas	
Dale and Pakenas	Plainsier
641 W Leks Street A	Plaintiff Wendy Shaw
641 W. Lake Street, Suite 400 Chicago, Illinois 60661	Date:
Attorneys for Plaints no	Date.
Attorneys for Plaintiff Pllar More	4 11
Date:	Minter on Alle use
	Michael David Myers
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	Seattle, Washington 98101
	Attorney for Plaintiff Shera Paglinawan
	Date: 12 . 3 . 2006
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aintiff Sara Brackenrich	
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Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
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Attorney for Plaintiff Simmy Floyd	255 East Fifth Street
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Date:	Date:
Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wordy Shaw Date: 2/06
Date:	Michael David Myers
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	1809 Seventh Avenue, Suite 700
	Seattle, Washington 98101
	Assures for Plaintff Shera Paglinawan
	Date:
Plaintiff Sara Brackenrich	
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